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2 NICHOLAS PETER HUMY  
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5 Counsel for Defendant DARLENE JOY MURPHY

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7  
8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA, ) No. CR 08-00042-RS  
12 )  
Plaintiff, )  
13 ) MOTION TO MODIFY PRETRIAL  
vs. ) RELEASE CONDITIONS; DECLARATION  
14 ) OF COUNSEL  
DARLENE JOY MURPHY, )  
15 )  
Defendant. )  
16 )

17 Ms. Murphy is charged with DUI in violation of 18 U.S.C. §13, Assimilating CVC  
18 23152(a). Among the conditions of her release is the restriction that she not travel outside the  
19 Northern District of California.

20 Ms. Murphy asks that the conditions of her pretrial release be modified to allow her to  
21 travel on April 11, 2008 by car with her brother, George Murphy (he would be the driver), his  
22 wife Deidra Murphy and Madeline Murphy, her niece. Ms. Murphy makes this request to attend  
23 her mother, Joyce Estes' bridal shower on April 13. During this time Ms. Murphy would stay at  
24 her mother's house located at 5460 Flora Way, Sun Valley, NV 89433 (775) 673-1819. Ms.  
25 Murphy's return date would be April 13, 2008. Ms. Murphy further requests permission to travel  
26 by car on May 9, 2008 with George Murphy (he would be the driver), his wife Deidra Murphy

1 and Madeline Murphy, her niece. Ms. Murphy makes this request to attend her mother, Joyce  
2 Estes' wedding on May 10, 2008. If allowed to travel, Ms. Murphy would return on May 11,  
3 2008. During this time Ms. Murphy would stay at the Peppermill Hotel in Reno, Nevada.

4 Ms. Murphy is not being supervised by Pretrial Services.

5 Undersigned counsel has spoken with Natasha Bode, Certified Law Clerk with the U.S.  
6 Attorney's Office, who is assigned to handle this matter. Ms. Bode stated that the government  
7 has no objections to the proposed modification of Ms. Murphy's pretrial release.

8 I, Nicholas Peter Humy, am an Assistant Federal Public Defender assigned to handle this  
9 matter for my office. By signing and filing this motion, I hereby declare under penalty of perjury  
10 that the facts asserted in support of the request are true and correct.

11 Dated: April 08, 2008

Respectfully submitted,

12 BARRY J. PORTMAN  
13 Federal Public Defender

14 /s/

15 NICHOLAS PETER HUMY  
16 Assistant Federal Public Defender  
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